

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

LA Chemical, Ltd.
Attn: William Kulikowski
138 Factory Road
Addison, Illinois 60101

Application No.: 90080017
Applicant's Designation:
Subject: Solvent Repackaging Operation
Date Issued: March 27, 2006
Location: 138 Factory Road, Addison

I.D. No.: 043005ALD
Date Received: August 15, 2005
Expiration Date: March 27, 2011

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of ten 10,000-gallon underground storage tanks with submerged loading pipe, one mixing tank, two repackaging lines, an activated carbon filter system to control the DMEA tank filling process, and a soil vapor extraction system as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year of volatile organic material, 10 tons/year for any single HAP and 25 tons/year for combination of HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- ii. To limit the VOM to less than 100 tons per calendar year. As a result 35 Ill. Adm. Code 218 Subpart QQ: "Miscellaneous Formulation Manufacturing Processes" does not apply pursuant to 35 Ill. Adm. Code 218.940(a)(1)(B); 35 Ill. Adm. Code 218 Subpart RR: "Miscellaneous Organic Chemical Manufacturing Processes" does not apply pursuant to 35 Ill. Adm. Code 218.960(a)(1)(B); and 35 Ill. Adm. Code 218 Subpart TT: "Other Emission Units" does not apply pursuant to 35 Ill. Adm. Code 218.980(a)(1)(B).
- iii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) issued for this location.
 - d. Pursuant to 35 Ill. Adm. Code 218.122(a) no person shall cause or allow the discharge of more than 8 lbs/hour of organic material in the atmosphere during the loading of organic material from the aggregate loading pipes of any loading area having throughput of greater than 40,000 gallons/day into any railroad tank or trailer unless such loading is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with Section 218.108.
 - e. Pursuant to 35 Ill. Adm. Code 218.122(b) no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gallons, unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with Section 218.108, or unless such tank is a pressure tank as described in Section 218.121(a) or fitted with a recovery system as described in Section 218.121(b) (2).
2. Emissions and operation of the facility shall not exceed the following limits:

a.	Emissions Unit	Throughput		Maximum Emission Rate	HAP Emissions (Methylene Chloride)	
	<u>Group A</u>	<u>(K Gal/Mo)</u>	<u>(K Gal/Yr)</u>	<u>(Lb/1000 Gal)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
	Tanks	20	240	9.760	0.10	1.17
	Drums	15	180	14.640	<u>0.11</u>	<u>1.32</u>
				Totals:	0.21	2.49

b.	Emissions Unit	Throughput		Maximum Emission Rate	VOM Emissions	
	<u>Group B</u>	<u>(K Gal/Mo)</u>	<u>(K Gal/Yr)</u>	<u>(Lb/1000 Gal)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
	Tanks	20	240	4.880	0.05	0.59
	Drums	15	180	7.320	0.06	0.66
	<u>Group C</u>					
	Tanks	200	2,400	3.660	0.37	4.40
	Drums	100	1,200	5.490	0.28	3.30
	<u>Group D</u>					
	Tanks	125	1,500	2.440	0.16	1.83
	Drums	75	900	3.660	0.14	1.65

Emissions Unit	Throughput		Maximum Emission Rate	VOM Emissions	
	(K Gal/Mo)	(K Gal/Yr)	(Lb/1000 Gal)	(Tons/Mo)	(Tons/Yr)
<u>Group E</u>					
Tanks	100	1,200	1.220	0.061	0.74
Drums	50	600	1.830	0.046	0.55
<u>Group F</u>					
Tanks	600	7,200	0.0732	0.22	2.64
Drums	300	3,600	1.098	0.17	1.98
<u>Group G</u>					
Tanks	250	3,000	0.244	0.031	0.37
Drums	130	1,560	0.366	0.024	0.29
<u>Group H</u>					
Tanks	250	3,000	0.024	0.0031	0.037
Drums	175	2,100	0.037	0.0032	0.039
Soil Vapor Extraction				<u>0.060</u>	<u>0.72</u>
Total:				1.68	19.80

These limits define the potential emissions of the solvent repackaging operation and the soil vapor extraction system and are based on the actual emissions determined from unit capacity, emission standards if applicable, and standard emission factors. The tanks include underground storage tanks, tanker trucks, mix tanks, totes, and other vessels with 55-gallon drums without submerged loading pipes. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
4. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 5a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator shall maintain readily accessible records of the dimensions of each storage vessel and an analysis of the capacity of each storage vessel

- b. The Permittee shall maintain monthly and annual records of the following:
- i. Solvent production from tanks, by group, in gallons/month and gallons/year.
 - ii. Solvent production from drums, by group, in gallons/month and gallons/year.
 - iii. Emissions of volatile organic material, by group, with supporting calculations, in tons/month and tons/year.
 - iv. Emissions of HAPs, by group, with supporting calculations, in tons/month and tons/year.
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:GMK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the solvent repackaging plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emissions Unit</u>	<u>E M I S S I O N S (Tons/Year)</u>	
	<u>HAP (Methylene Chloride)</u>	<u>VOM</u>
<u>Group A</u>		
Tanks	1.17	
Drums	1.32	
<u>Group B</u>		
Tanks		0.59
Drums		0.66
<u>Group C</u>		
Tanks		4.40
Drums		3.30
<u>Group D</u>		
Tanks		1.83
Drums		1.65
<u>Group E</u>		
Tanks		0.74
Drums		0.55
<u>Group F</u>		
Tanks		2.64
Drums		1.98
<u>Group G</u>		
Tanks		0.37
Drums		0.29
<u>Group H</u>		
Tanks		0.037
Drums		0.039
Soil Vapor Extraction		0.720
Totals	2.49	19.796

GMK:psj